

## **DOCUMENT REQUESTS**

Please produce the documents set forth in Schedule A, provided, however, that in order to facilitate production of documents on an expedited basis, you may limit your production at this time to documents you furnished at any time after November 8, 2016 to: (a) the Special Counsel's Office established by Department of Justice Order No. 3915-2017 (May 17, 2017); (b) the United States Attorney's Office for the Southern District of New York ("SDNY"); (c) any other federal or state regulatory and/or law enforcement agency; (d) any congressional committee; or (e) in civil or other litigation. This includes but is not limited to documents that were voluntarily provided, produced under compulsion, or seized. Instructions for producing documents appear in Schedule B, and definitions appear in Schedule C.

### **SCHEDULE A**

- 1) All documents relating to the following:
  - a) Communications between Donald McGahn and President Donald Trump on or about January 26-27, 2017, relating to Michael Flynn's statements to the FBI about his contacts with Sergey Kislyak.
  - b) The resignation or termination of Michael Flynn, including but not limited to the discussion of Sean Spicer's February 14, 2017 public statements about Flynn's resignation.
  - c) Communications involving one or more of the following individuals relating to Michael Flynn and/or efforts to deny the existence of any investigation or evidence of contacts between the Trump Campaign and Russian Federation: yourself, James Comey, Andrew McCabe, Mike Rogers, and Dan Coats.
  - d) President Trump's contacts with James Comey on or about January 27, 2017, February 14, 2017, March 30, 2017, and April 11, 2017.
  - e) Communications involving one or more of the following individuals on or about May 8-9, 2017 relating to the possible termination of James Comey: President Trump, Vice President Pence, Reince Priebus, Stephen Bannon, Don McGahn, Jared Kushner, Stephen Miller, Jeff Sessions, and/or Rod Rosenstein. Such communications include, but are not limited to, all draft termination letters and related documents and all documents relating to the May 9, 2017 Rosenstein memorandum to Sessions entitled "Restoring Public Confidence in the FBI."
  - f) The May 9, 2017 termination of James Comey, including but not limited to the reasons for the termination.
  - g) Meetings or discussions in or around May 2017 involving the FBI and/or the DOJ relating to the termination of James Comey, including but not limited to those involving

Rosenstein and Andrew McCabe at which any of the following were discussed: obstruction of justice, surreptitious recording of the President, or the 25<sup>th</sup> Amendment.

- h) Communications by President Trump or anyone acting on his behalf relating to Jeff Sessions's recusal from any investigation related to the 2016 Presidential campaign. This includes, but is not limited to: (i) any attempts to block Sessions from recusing himself in or around March 2017; (ii) any attempts to cause Sessions to reverse his recusal decision; (iii) any criticism of Sessions's March 2, 2017 recusal decision; and (iv) any attempts to limit, hide, or prevent a written ethics opinion related to Sessions's recusal decision.
- i) The actual or possible resignation or termination of:
  - i) Jeff Sessions, including but not limited to any discussion involving President Trump regarding Sessions's possible resignation or firing on or about May 17, 2017, July 2017, and November 2018;
  - ii) Rod Rosenstein, including but not limited to any discussion involving President Trump regarding Rosenstein's possible resignation or firing throughout 2018;
  - iii) Robert Mueller, including but not limited to any discussion involving President Trump regarding Mueller's firing on or around June 2017, or any conversation in which President Trump stated, in words or substance, that he wanted the Mueller investigation shut down, restrained, or otherwise limited in or around December 2017.
- i) The June 9, 2016 Trump Tower meeting attended by Donald Trump Jr., Paul Manafort, Kushner, Natalia Veselnitskaya, Rob Goldstone, and Rinat Akhmetshin (the "Trump Tower meeting"), including but not limited to all documents relating to the July 8, 2017 statement released in the name of Donald Trump Jr.
- j) Discussions or efforts to discipline, reassign, terminate, encourage or force to resign, demote, or otherwise affect the job status of any of the following: Andrew McCabe, Jim Rybicki, Bill Priestap, Jim Baker, Peter Strzok, Lisa Page, and/or Bruce Ohr.
- k) Possible pardons for Paul Manafort, Michael Flynn, or Michael Cohen.
- l) Communications between Matthew Whitaker and President Trump or between Whitaker and any other White House personnel regarding any of the following: (a) the SDNY Investigations; (b) the recusal of U.S. Attorney Geoffrey Berman from the SDNY Investigations; (c) the reassignment or potential reassignment of SDNY personnel from the SDNY Investigations; or (d) Special Counsel Mueller's investigation.
- m) Michel Cohen's statements to the House Permanent Select Committee on Intelligence and the Senate Select Committee on Intelligence relating to the timing of the Trump Organization's efforts to develop a property in Moscow. This includes but is not limited to drafts of such statements and communications about such drafts or final statements.

- 2) All documents relating to any payment, or discussions regarding any actual or potential payment, to any person or entity by Michael Cohen, Essential Consultants LLC, or American Media Inc. (“AMI”) for the benefit of Donald Trump or the Trump Campaign. This includes, but is not limited to, any documents relating to the reimbursement of Cohen, Essential Consultants LLC, or AMI for any such payments, and any documents relating to the omission or inclusion of information about liabilities associated with such payments on Donald Trump’s Public Financial Disclosure Reports (OGE Form 278e) filed in 2017 and 2018.
- 3) All documents relating to the following:
  - a) Any foreign government discussing, offering, or providing, or being solicited to discuss, offer, or provide, any present or emolument of any kind whatever on or after November 8, 2016 to (a) Donald Trump or his Business Interests; (b) Trump Organization; (c) Jared Kushner or his Business Interests; (d) Ivanka Trump or her Business Interests; or (e) the 58<sup>th</sup> Presidential Inaugural Committee.
  - b) Any U.S. federal, state, or local domestic government discussing, offering, or providing, or being solicited to discuss, offer, or provide, any emolument on or after November 8, 2016 to (a) Donald Trump or his Business Interests; (b) Trump Organization; (c) Jared Kushner or his Business Interests; (d) Ivanka Trump or her Business Interests; or (e) the 58<sup>th</sup> Presidential Inaugural Committee.
  - c) Any loan, financing transaction, or capital investment by the Russian Federation, any Russian national, any Russian business, or any other Russian entity to the Trump Organization, Donald Trump, Ivanka Trump, Jared Kushner, or any of their Business Interests. This request shall include the period from January 1, 2015 to the present and shall exclude documents relating to the purchase of individual condominium, cooperative, or apartment units.
  - d) Trump Tower Moscow (also known as the “Moscow Project”) or any other proposed or possible real estate development in the Russian Federation by Donald Trump or the Trump Organization from January 1, 2015 to the present.
  - e) The June 9, 2016 Trump Tower meeting, including but not limited to contacts or communications about the meeting involving one or more of the following individuals: Donald Trump Jr., Natalia Veselnitskaya, Donald Trump, Paul Manafort, Jared Kushner, Emin Agalarov, Aras Agalarov, Rob Goldstone, and/or Rinat Akhmetshin.
  - f) The “Republican Platform 2016” provisions relating to Russia and Ukraine, including, but not limited to, the exclusion of language related to providing lethal defensive weapons to Ukraine and the inclusion of language about providing “appropriate assistance” to the armed forces of Ukraine.

- g) Discussions or attempts to provide or receive election information, campaign data, or campaign communications with, to, or from foreign entities or individuals in connection with the 2016 U.S. Presidential primary or general elections. This includes, but is not limited to, voter data, polling information, political ad targeting, voter registration rolls, social media data, and campaign or party e-mails.
- h) Discussions of United States imposed sanctions or potential sanctions against the Russian Federation from June 16, 2015 to January 20, 2017 (including but not limited to the sanctions imposed pursuant to the Magnitsky Act) involving one or more of the following individuals: Donald Trump, the Trump Campaign, the Trump Organization, Paul Manafort, Rick Gates, Michael Cohen, Michael Flynn, Jeff Sessions, Jared Kushner, Thomas Bossert, Roger Stone, Jerome Corsi, George Papadopoulos, Carter Page, Konstantin Kilimnik, K.T. McFarland, and/or Erik Prince.
- i) Any contacts, direct or indirect, from January 1, 2015 to January 20, 2017 between or involving the Russian Federation and its officials, agents, intermediaries, and/or instrumentalities and any of the following: Donald Trump, the Trump Campaign, the Trump Organization, Paul Manafort, Rick Gates, Michael Cohen, Michael Flynn, Jeff Sessions, Jared Kushner, Thomas Bossert, Roger Stone, Jerome Corsi, George Papadopoulos, Carter Page, Konstantin Kilimnik, K.T. McFarland, and/or Erik Prince.
- j) Any contacts, direct or indirect, from January 1, 2016 to the present between or involving WikiLeaks and its officials, agents, intermediaries, and/or instrumentalities.
- k) Any contacts, direct or indirect, from January 1, 2016 to the present between Paul Manafort and/or Rick Gates and any of the following individuals: Konstantin Kilimnik, Serhiy Lyovochkin, and/or Rinat Akhmetov.
- l) Any contacts, direct or indirect, from January 1, 2016 to the present between Michael Cohen and any of the following: Viktor Vekselberg, Andrew Intrater, or Columbus Nova or its officials, agents, intermediaries, and/or instrumentalities.
- m) The contents of meetings between President Trump and Vladimir Putin on July 7, 2017, November 11, 2017, July 16, 2018, and November 30, 2018.